

MICHAEL A. JACOBS (CA SBN 111664)  
MJacobs@mofo.com  
ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzalez@mofo.com  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, California 94105-2482  
Tel: 415.268.7000 / Fax: 415.268.7522

KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsfllp.com  
HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsfllp.com  
BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
Washington DC 20005  
Tel: 202.237.2727 / Fax: 202.237.6131

WILLIAM CARMODY (*Pro Hac Vice*)  
bcarmody@susmangodfrey.com  
SHAWN RABIN (*Pro Hac Vice*)  
srabin@susmangodfrey.com  
SUSMAN GODFREY  
1301 Avenue of the Americas, 32nd Floor  
New York, NY 10019-6023  
Tel: 212.336.8330 / Fax: 212.336.8340

Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF  
THOMAS J. PARDINI IN SUPPORT  
OF DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL EXHIBITS  
ATTACHED TO NOTICE OF FILING  
OF PHOTOGRAPHS**

I, Thomas J. Pardini, declare as follows:

1. I am a member of the Bar of the State of California and an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File under Seal Exhibits Attached to Notice of Filing of Photographs.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibits A-B	Entire Documents	Defendants

3. Exhibits A-B are photographs containing highly confidential information regarding the technical details of Uber's LiDAR systems. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into the technical components of Uber's LiDAR sensors, such that Uber's competitive standing could be significantly harmed.

4. Defendants' request to seal is narrowly tailored to the portions of their Notice and attached exhibits that merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 25th day of October, 2017 at San Francisco, California.

/s/ Thomas J. Pardini  
Thomas J. Pardini

**ATTESTATION OF E-FILED SIGNATURE**

I, Esther Kim Chang, am the ECF User whose ID and password are being used to file this Declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas J. Pardini has concurred in this filing.

Dated: October 25, 2017

/s/ Esther Kim Chang

ESTHER KIM CHANG